

August 20, 2019

via ECFS and e-mail

Marlene H. Dortch
Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

**Re: CG Docket Nos. 03-123, 13-24, 05-231, and RM-11848
MB Docket No. RM-11065**

Dear Ms. Dortch,

Today, Lise Hamlin of the Hearing Loss Association of America (HLAA), Linda Kozma-Spytek of Gallaudet University's Technology Access Program, and I spoke to Michael Scurato in Commissioner Starks' office regarding the use of automatic speech recognition (ASR) in live television captioning and Internet Protocol captioned telephone service (IP-CTS) as it relates to the above-referenced dockets. In particular, we reiterated points raised by deaf and hard of hearing consumer groups and accessibility researchers:

- In our July 26, 2018 ex parte on IP-CTS certification of ASR providers;¹
- In our comments,² reply comments,³ and December 19, 2018 ex parte⁴ regarding the Commission's pending Further Notice of Proposed Rulemaking on IP CTS, including issues around 911, state administration, consumer eligibility, and waste, fraud, and abuse; and

¹ Letter from Blake Reid, Counsel to TDI, to Marlene H. Dortch,
[https://ecfsapi.fcc.gov/file/1091799662503/2018.07.26%20IP%20CTS%20Application%20Framework%20Final%20\(attachment\).pdf](https://ecfsapi.fcc.gov/file/1091799662503/2018.07.26%20IP%20CTS%20Application%20Framework%20Final%20(attachment).pdf).

² Comments of HLAA, TDI, et al.,
<https://ecfsapi.fcc.gov/file/1091883305258/2018.09.17%20Draft%20IP%20CTS%20FNP%20Comments%20final.pdf>.

³ Reply Comments of HLAA, TDI, et al.,
<https://ecfsapi.fcc.gov/file/101630636302/2018.10.16%20Consumer%20Groups%20FNP%20Reply%20Comments%20Final.pdf>

⁴ Ex Parte of HLAA, TDI, et al.,
<https://ecfsapi.fcc.gov/file/1220063005345/2018.12.20%20Consumer%20Groups%20IP%20CTS%20Ex%20Parte%20final.pdf>.

- In our July 31, 2019 petition for declaratory ruling and/or rulemaking on live television captioning metrics.⁵

Please don't hesitate to let me know if you have any questions.

Respectfully submitted,

/s/

Blake Reid

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Hard of Hearing, Inc. (TDI)*

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CC:

Michael Scurato, Office of Commissioner Starks

Suzy Rosen Singleton, Disability Rights Office

⁵ Petition of TDI, et al., <https://www.fcc.gov/ecfs/filing/10801131063733>.